

**REMARKS**

Applicants respectfully request favorable reconsideration of this application, as amended.

At the outset, Applicants would like to thank Examiner St. Cyr for the courtesies extended to Applicants' representative during the interview conducted on August 31. Applicants also note with appreciation the indication of allowable subject matter within Claims 10, 18 and 19.

Claims 1-8, 11-16 and 23-26 were rejected under 35 U.S.C. § 102(e) as being anticipated by Phillips (U.S. 6,396,927), while Claims 9, 14 and 20-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Phillips. In response, Claims 1 and 25 have been amended to recite, more clearly, that the halftone image is a line screen half tone image, while Claim 26 has been amended to recite, more clearly, a screen line for producing line-screened picture motifs. Support for these amendments may be found, generally, throughout the specification and figures.<sup>1</sup> Additionally, the claims have been amended, generally, to comport with amended Claim 1, as well as to remove parenthetical reference numbers.<sup>2</sup> No new matter has been added, and Applicants respectfully submit that Phillips fails to teach or suggest all of the features recited by the pending claims.

Various aspects of the present invention modify prior art line rasterization techniques for line screen halftone images in order to provide further authenticity features for documents of value. *See, e.g.,* Specification at Page 1 (4<sup>th</sup> paragraph), etc. As compared to the prior art, in which the rasterized lines in the line screen halftone image are width-modulated symmetrically about both sides of the center line,<sup>3</sup> the present invention provides width modulation on only one side of the center line. *See, e.g.,* FIG. 4; Specification at Pages 1-2 (bridging paragraph), etc. Accordingly, the linear structural elements and screen lines of the present invention are smooth (or flat) on one side of the centerline, i.e., the baseline, and are width-modulated on the other side of the centerline in accordance with a desired grey value.

---

<sup>1</sup> *See, e.g.,* Specification at Page 1 (4th paragraph) *et seq.*, FIG. 4 *et seq.*

<sup>2</sup> However, Claim 14 remains in its original form, while Claim 24 was previously amended to eliminate multiple dependencies.

<sup>3</sup> *See, e.g.,* screen lines 5,6 depicted within FIG. 3 ("Prior Art"); Specification at Page 7 (2<sup>nd</sup>, 3<sup>rd</sup> paragraphs), etc.

Phillips discloses a counterfeit-resistant document that has a contrasting layer and a dynamic camouflaging layer. *See, e.g.,* Abstract; Col. 4:64 to Col. 5:4; Figures 3A–E, etc. The contrasting layer includes a hidden text message and a background pattern, and, while Phillips' text message and background pattern may be printed as an image, Applicants submit that these images are not line screen halftone images or line-screened picture motifs, as recited by Claims 1, 25 and 26. Furthermore, Phillips fails to disclose linear structural elements or screen lines that are width-modulated on one side and flat on the other side, as recited by Claims 1, 25 and 26. Instead, Phillips teaches that his images are formed from a pattern of elements, preferably dots. *See, e.g.,* Col. 5:2–3. And, while Phillips suggests that his pattern of elements may "alternatively comprise of lines or marks" (Col. 5:3–4), Phillips offers no further details on the structure of these lines or marks, particularly with respect to width modulation. Consequently, Phillips fails to disclose all of the features recites by Claims 1, 25 and 26. Moreover, Applicants submit that none of the remaining references, taken either singly or in combination, teaches or suggests these features.

Accordingly, Claims 1, 25 and 26 are allowable over the cited art. Additionally, Claims 2–9, 11–17 and 20–24, depending from Claim 1, are also allowable, at least for the reasons discussed above.

In view of the foregoing amendments and remarks presented herein, Applicants respectfully submit that this application is in condition for allowance and should now be passed to issue.

A Notice of Allowance is respectfully solicited.

If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

The Commissioner is hereby authorized to charge any fees and to credit any overpayments that may be required by this paper under 37 C.F.R. §§ 1.16 and 1.17 to Deposit Account No. 02-2135.

Respectfully submitted,

September 17, 2007

By:  \_\_\_\_\_

Rothwell, Figg, Ernst & Manbeck P.C.  
1425 K Street, N.W., Suite 800  
Washington, D.C. 20005  
(202) 783-6040 (voice)  
(202) 783-6031 (fax)

George R. Repper  
Registration No. 31,414

Adam M. Treiber  
Registration No. 48,000

#1432004\_1